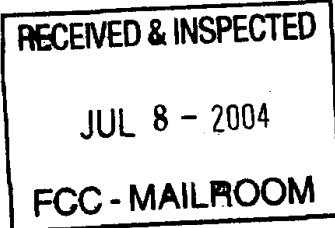




Germantown Telephone Company Inc.
P.O. Box 188 210 Main Street Germantown, NY 12526
toll free 877-537-6255 local 518-537-6255
fax 518-537-6700 web www.gtowntel.com

July 1, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20544



Re: In the Matter of The Pay Telephone Reclassification and Compensation
Provisions of the Telecommunications Act of 1996, CC Docket 96-128

Dear Ms. Dortch:

Germantown Telephone Company ("GTC") submits this letter and accompanying certification as record that GTC is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")¹, released on October 3, 2003, respecting the obligations of Completing Carriers to provide certain compensation and reporting to payphone service providers (PSPs), replacing the Commission's interim compensation rules effective July 1, 2004.

As GTC is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to PSPs, GTC is not subject to such requirements at this time. If GTC's operations are altered to the extent that GTC necessarily becomes a Completing Carrier, GTC intends to fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,

Sherry Barringer
Office Manager
Germantown Telephone Company, Inc.

cc: Ms. Ruth Jaeger
President
APCC Services, Inc.
625 Slater Lane, Suite 104
Alexandria, Virginia 22314

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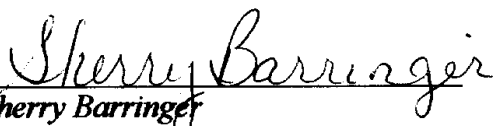
¹ The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).

**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF GERMANTOWN TELEPHONE COMPANY**

RECEIVED & INSPECTED
JUL 8 - 2004
FCC - MAILROOM

1. My name is Sherry Barringer. I currently serve as the Office Manager of Germantown Telephone Company (GTC), a provider of local exchange telecommunications services as an Independent Local Exchange Carrier in the state of New York. In this capacity, I have become familiar with the network operations of GTC and its practices associated with the completion of calls originated from Pay Telephones.
2. GTC is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. GTC's provision of operator services for the completion of local calls from pay telephones is handled by Verizon through a contractual arrangement.
4. GTC has confirmed with Verizon that any calls processed by Verizon are included in the respective call tracking systems and compensation remittance process of Verizon.
5. GTC does not currently provide a coinless access code service.
6. GTC does not currently provide a subscriber toll-free service.
7. In consideration of the aforementioned facts, GTC is not subject to the compensation or reporting requirements related to the Commission's Report and Order¹ and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 1, 2004.


Sherry Barringer
Office Manager
Germantown Telephone Company, Inc.
P O Box 188
Germantown, New York 12526

¹ The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).